

Before the
POSTAL REGULATORY COMMISSION
Washington, DC 20268-0001

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Mail Processing Network Rationalization)	Docket No. N2012-1
Service Changes, 2012)	
_____)	

NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORIES TO THE
USPS (NPMHU/USPS-1-6)

Pursuant to Rule 26 of the Commission's Rules of Practice and Procedure, the National Postal Mail Handlers Union ("NPMHU") hereby submits the following interrogatories to the United States Postal Service. If necessary, please redirect any interrogatory to any specific USPS witness.

INTERROGATORIES

NPMHU/USPS-1 Please provide all spreadsheets, schedules, maps, and other documents reviewed by witness Martin's office or anyone else at Headquarters with respect to the development or approval of any of the AMP studies announced on February 23, including those referenced in Ms. Martin's testimony at page 1197, lines 15-17 and pages 1202, lines 7-9, pages 1203, lines 6-14.

NPMHU/USPS-2 With respect to the Springfield, MO AMP:

- (a) Please explain why the study states that several large pieces of processing equipment will need to be added to the Kansas City facility (see page 8), but there is no additional projected maintenance cost for mail processing equipment (see page 37).
- (b) Referring to page 41, please explain why the “proposed result” for both the losing facilities is the same as the “current” mileage for the losing facility, yet the study projects \$578,593 in HCR contract savings from the losing facility.
- (c) Please explain why “Q” refers to when describing frequency of HCR transportation routes. For instance, in the Springfield, MO, AMP study, what does it mean when it says “modify existing HCR 64014 – 14 frequency Q6; Change departure time from 1900 to 1830 and the frequency from Q6 to Q7.”
- (d) Please explain how the estimated on-time costs of \$465,000 for relocation on page 45 was calculated, given that the staffing matrices in the AMP indicate that 212 craft employees and 22 management employees will need to be relocated to Kansas City, and previous testimony has stated that average relocation costs in 2011 were \$5,831 per employee (APWU/USPS-T8-2).

NPMHU/USPS-3 Please explain what costs are included in the average relocation cost of \$5,831 (APWU/USPS-T8-2), including in your answer whether this includes such items as paid time off, mileage, per diems, moving expenses, assistance in closing costs, etc.

NPMHU/USPS-4 With reference to the “building equipment” (LDC 37) expense category referenced in the Maintenance chart included in the AMP studies:

- (a) Please explain what types of equipment and/or expenses are included in this category;
- (b) With respect to facilities remaining open for retail, BMEU, and hub transfer functions (as an example, but not limited to, Tucson; Springfield, MO; and Colorado Springs), please explain how these “building equipment” expenses can be entirely eliminated for the losing facility, despite the facility remaining open for retail, BMEU and hub transfer functions.
- (c) Please explain how it was determined whether the gaining facility would incur additional building equipment expenses, and what those additional expenses would be.

NPMHU/USPS-5 With respect to all facilities in which the AMP study announced on February 23 stating that the facilities will be operated as a transfer hub, please provide all calculations used to determine the number of work hours, and the schedule of work hours, that will be required to operate the hub.

NPMHU/USPS-6 With respect to Witness Williams’ Response to Question from Commissioner Taub During 3/20/12 Cross-Examination):

- a) Please confirm that there are two types of efficiencies reflected in the calculations of labor hours for gaining facilities in the AMPs – the productivity

improvements discussed at pages 5 through 9, and the economies of scale increases discussed at pages 9 through 11.

- b) If (a) is not confirmed, please explain in what way that statement is incorrect.
- c) Please provide a citation to library reference or USPS publication that defines what types of operations are included in each of the different Labor Distribution Codes discussed in Witness Williams's response, or provide those definitions in your response.

Respectfully submitted,

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